

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2019 -253-T

Application of Strong Men Moving LLC for a
Class E (Household Goods) Certificate of
Public Convenience and Necessity for
Operation of Motor Vehicle Carrier with
Statewide Authority

**MOTION FOR PERMISSION TO
PRESENT SHIPPER WITNESS
TESTIMONY BY AFFIDAVIT**

The Commission's regulation concerning the proof required to support an application for a Certificate of Public and Convenience and Necessity for a Class E Mover of Household Goods with Statewide Authority is found in S.C. Code Regs. 103-333. Applicant submits the interests of judicial economy would be served by the Commission allowing it to present the testimony of its "shipper witness" by affidavit subject to the conditions set forth in Application of Midlands Movers, LLC, Order No. 2018-643, Docket No. 2018-268-T, and therefore so moves.

Respectfully submitted,

s/ Charles L.A. Terreni

Date: September 23, 2019

Charles L.A. Terreni
TERRENI LAW FIRM, LLC
1508 Lady Street
Columbia, South Carolina 29201
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SC Bar. No. 15235

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THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

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a Class E (Household Goods) Certificate of
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**AFFIDAVIT OF
SHIPPER WITNESS**

Being duly deposed and sworn, Affiant states:

1. My name is Matthew Rubin, President of Mr. Marketing and my address is 875 V Lowcountry Blvd #204, Mount Pleasant, SC 29464.
2. I am giving this affidavit in support of the application of Strong Men Moving LLC for a Class E Certificate of Public Convenience and Necessity with statewide authority to move household goods to points and places throughout the state of South Carolina.
3. I am a Mount Pleasant business owner since 2012. My company runs digital marketing campaigns for 193 small businesses currently, most of which are in the Charleston area.
4. I know the public needs qualified movers to transport household goods within South Carolina because:

Many Mount Pleasant movers are no longer taking new customers given how booked they are with people moving to Mount Pleasant.

5. Based on my knowledge of the need for household goods movers in South Carolina, I believe the public interest would be served by granting a Certificate of Public Convenience and Necessity to Strong Men Moving LLC.
6. I also would like the Commission to know the following information about the Applicant: Strong Men Moving LLC currently has 18 5 star reviews on Google and that is evidence that they are a trustworthy business that has an excellent reputation helping homeowners move to the Mount Pleasant area.

Further Affiant sayeth not.


Affiant

SWORN TO ME THIS 18 DAY OF 09 2019

Alexis Coolley
NOTARY PUBLIC FOR SOUTH CAROLINA
MY COMMISSION EXPIRES 08/11/2029



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BEFORE
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CERTIFICATE OF SERVICE

I, **Carl E. Bell**, hereby certify that I have, on this **23rd day of September 2019**, served the **Affidavit of Shipper Witness and Motion for Permission to Present Shipper Witness Testimony by Affidavit for STRONG MEN MOVING, LLC**, upon the parties listed below by electronic mail:

Jenny R. Pittman, Esquire
jpittman@regstaff.sc.gov
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201

John H. Wisniewski
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Columbia, South Carolina
September 23, 2019